

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Newport News Division

G.G., by his next friend and mother,)	
DEIRDRE GRIMM,)	
)	
Plaintiffs,)	
)	Civil No. <u>4:15cv54</u>
v.)	
)	
GLOUCESTER COUNTY SCHOOL)	
BOARD,)	
)	
Defendant.)	

DECLARATION OF G.G.

1. I am the plaintiff in the above-captioned action. I have actual knowledge of the matters stated in this declaration.

2. My name is G.G.

3. Several photographs of me taken over the past year are attached to this declaration as Exhibit A.

4. I was born in Gloucester County on May 4, 1999, and have lived in Gloucester County my entire life.

5. I am a student at Gloucester High School. I will begin my junior year of high school in September 2015.

6. Although my sex assigned at birth was female, I was aware at a very young age that I did not feel like a girl. I have always felt uncomfortable wearing “girl” clothes, and by the age of six, I adamantly refused to do so. I insisted upon buying all of my clothes in the boys’ department.

7. At approximately age twelve, I acknowledged my male gender identity to myself. I gradually began disclosing this fact to close friends. Since the reactions of my friends were generally positive and supportive, I disclosed my gender identity to more friends.

8. In approximately ninth grade, most of my friends were aware of my gender identity, and I lived openly as a boy when socializing with friends away from home and school.

9. During my freshman year, I experienced severe depression and anxiety related to my untreated Gender Dysphoria and the stress of concealing my gender identity from my family. The depression and anxiety was so severe that I could not attend school during the spring semester of my freshman year. Instead, I took classes through a home-bound program that follows the public high school curriculum.

10. In April 2014, I told my parents that I am transgender. At my request, I began therapy with a psychologist who had experience with working with transgender patients.

11. The psychologist diagnosed me with Gender Dysphoria. The psychologist recommended that I immediately begin living as a boy in all respects. That included using a male name and pronouns and using boys' restrooms. The psychologist gave me a "Treatment Documentation Letter" confirming that I am receiving treatment for Gender Dysphoria and that, as part of that treatment, I should be treated as a boy in all respects, including with respect to my use of the restroom. In addition, the psychologist recommended that I see an endocrinologist to begin hormone treatment for Gender Dysphoria.

12. In July 2014, I petitioned the Circuit Court of Gloucester County to change my legal name to G.G., and the court granted the petition. I now use that name for all purposes, and my friends and family refer to me using male pronouns.

13. I use the boys' restrooms when out in public, e.g., at restaurants, libraries, shopping centers.

14. I have been receiving hormone treatment since December 2014. The hormone treatment has deepened my voice, increased my growth of facial hair, and given me a more masculine appearance.

15. In August 2014, my mother and I informed officials at Gloucester High School that I am transgender and that I changed my legal name. The high school agreed to change my name in my official school records.

16. Before the beginning of my sophomore year, my mother and I met with Gloucester High School Principal T. Nathan Collins and guidance counselor Tiffany Durr to discuss my treatment for Gender Dysphoria and the need for me to socially transition at school as part of my medical treatment. Mr. Collins and Ms. Durr both expressed support for me and a willingness to ensure a welcoming environment for me at school.

17. Ms. Durr and I agreed that I would send an email to teachers explaining that I was to be addressed using the name G.G. and to be referred to using male pronouns. To the best of my knowledge, no teachers, administrators, or staff at Gloucester High School expressed any resistance to calling me by my legal name or referring to me using male pronouns.

18. I requested, and was permitted, to continue with the home-bound program only for my physical education requirement while returning to school for the rest of my classes. For this reason, I do not intend to use a locker room at school.

19. I initially agreed to use a separate restroom in the nurse's office because I was unsure how other students would react to my transition. When the 2014-15 school year began, I was pleased to discover that my teachers and the vast majority of my peers respected the fact that

I am a boy. I quickly determined that it was not necessary for me to continue to use the nurse's restroom, and I found it stigmatizing to use a separate restroom. The nurse's bathroom was also very inconvenient to reach from my classrooms, making it difficult for me to use the restroom between classes. For these reasons, I asked Mr. Collins to be allowed to use the boys' restrooms.

20. On or about October 20, 2014, Mr. Collins agreed that I could use the boys' restrooms. For approximately the next seven weeks, I used the boys' restrooms at school. When I used the boys' restrooms, I never encountered any problems from other students.

21. On November 10, 2014, I learned that the School Board would be voting on a proposal at its meeting on November 11, 2014, to adopt a transgender restroom policy that would prohibit me from continuing to use the boys' restroom. My parents and I attended the meeting to speak against the policy. In doing so, I was forced to identify myself to the entire community, including local press covering the meeting, as the transgender student whose restroom use was at issue.

22. I also attended the School Board's meeting on December 9, 2014, when it adopted the transgender restroom policy.

23. As a result of the School Board meetings and the new transgender restroom policy, I feel like I have been stripped of my privacy and dignity. Having the entire community discuss my genitals and my medical condition in a public setting has made me feel like a walking freak show. This personal information about my medical status, and about my very anatomy, has become a public spectacle. My entire community can now identify me as "the transgender student who wants to use the boys' room," which makes me incredibly anxious and fearful.

24. The day after the school board meeting, Mr. Collins told me that I would no longer be allowed to use the boys' restrooms and that there would be disciplinary consequences if I tried to do so.

25. Using the girls' restroom is not a possibility for me. Even before I began receiving treatment for Gender Dysphoria, girls and women who encountered me in female restrooms reacted negatively because they perceived me to be a boy. For example, when I used the girls' restroom in eighth and ninth grade, girls would tell me "this is the girls' room" and ask me to leave. My appearance now is even more masculine. In addition, using the girls' room would cause me to experience severe psychological distress and would be incompatible with my treatment for Gender Dysphoria.

26. To the best of my knowledge, there are now three single-stall unisex restrooms at Gloucester High School that I am permitted to use. Only one of the single-stall restrooms is located anywhere near the restrooms used by other students. Unlike some of the boys' restrooms, none of the new single stall restrooms are located near my classes. As far as I am aware, none of the other students uses the single-stall unisex restrooms.

27. I refuse to use the separate single-stall restrooms because they make me feel even more stigmatized and isolated than when I use the restroom in the nurse's office. They designate me as some type of "other" or "third" sex that is treated differently than everyone else. Everyone knows that they were installed for me in particular so that other boys would not have to share the same restroom as me.

28. Instead of using the separate restrooms, I try to avoid using the restrooms entirely while at school, and, if that is not possible, I use the nurse's restroom. I limit the amount of liquids I drink and try to "hold it" when I need to urinate during the school day. As a result of

trying to avoid using the restroom, I have repeatedly developed painful urinary tract infections. "Holding it" is also uncomfortable and distracting when I am trying to focus in class.

29. Every time I use the restroom at school, I am reminded that nearly every person in my community now knows I am transgender and that I have now been publically identified as "different." It also stark reminder that I was born in the wrong sex, which increases my feelings of dysphoria, anxiety, and distress.

30. It is embarrassing that, every time I use the restroom, everyone who sees me enter the nurse's office knows exactly why I am in there. They know it is because I am transgender and I have been prohibited from using the same boys' restrooms that the other boys use.

31. It also feels humiliating that, whenever I have to use the restroom, I am effectively reminding anyone who sees me go to the nurse's office that, even though I am living and interacting with the world in accordance with my gender identity as a boy, my genitals look different.

32. I just want to live my life like any other boy. And I want to perform the basic human function of using the restroom without being made to feel alienated, humiliated, and different than everyone else.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 3, 2015.

By: _____

G.G.